



Nebraska Public Power District

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, DC 20554

Ref: ET Docket No. 92-9

Dear Ms. Searcy:

COMMENTS OF NEBRASKA PUBLIC POWER DISTRICT

Pursuant to Section 1.415 of the Commission's rules, Nebraska Public Power District hereby respectfully submits its comments on the Notice of Proposed Rule Making (NPRM), FCC 92-20, released February 7, 1992, in the above-referenced matter.

Nebraska Public Power District (NPPD) is a political subdivision of the State of Nebraska and was formed in 1970 from three existing utilities. NPPD is an electric utility with a total generating capacity of 2500 megawatts. Our chartered service area covers all or parts of 91 of Nebraska's 93 counties (76,000 square miles) and reaches over 760,000 end users. The District generates and distributes electric energy to 96 wholesale customers and 106,000 retail customers.

NPPD owns and operates 57 microwave paths that are used for monitoring, protection and control of its generation and transmission facilities. This microwave system also supports corporate data communications, two-way radio, paging, telephone and load management. It also provides monitoring and control of our irrigation projects and emergency circuits to our nuclear plant. Our microwave system is interconnected with eight other electric utilities. These interconnections allow for exchange of critical data needed to support the operation of an interconnected electric system grid.

The District opposes a reallocation of spectrum in the 1850-2200 MHz band for the creation of a spectrum reserved for development of emerging technologies. NPPD has 57 microwave paths that connect to our facilities. If relocation of users in the 1850-2200 microwave band occurs, it will affect 56 of these microwave paths. The relocation cost to another band is estimated to cost over \$7,000,000. This assumes that there will be suitable microwave spectrum available in other bands. One of the reasons for the District purchasing and installing its own

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private microwave system was the lack of reliability of leased telephone circuits. The State of Nebraska has approximately 40 independent telephone companies. Leased circuits to some of our locations would require facilities from several companies. When problems arise, resolution of the problem can be lengthy. Several years ago, telephone service was not available to all our locations. Our experience with leased circuits has proven to be less reliable than our private microwave system. Therefore, if we have to revert to leased circuits, we will expect reduced reliability for our electric system. From the reports we have read, we are not convinced that other bands will provide enough frequencies to relocate all the 2GHz microwave users. We have experienced frequency congestion in the 2GHz band at one of our remote locations. The District will require additional frequencies as our load grows and we need to add additional facilities.

The District has also investigated other forms of communication such as satellite and fiber optics. Due to signal delays associated with satellite systems, they are not suitable for protection and some control functions. Fiber optics is a good communication medium and is cost-effective when hundreds of channels are required. It is not cost-effective when a few channels are required. Most of our locations will require fewer than twelve channels.

NPPD urges the Commission to consider alternate bands, such as the 2500-2690 MHz "Wireless Cable" band, or governmental frequencies as a possible home for the spectrum reserve. It appears costly and unnecessary to relocate successful users of the band (with real public service needs) for unknown or untested uses for these frequencies, especially if other frequencies are available.

If the final decision is to reallocate the 2GHz band users for emerging technologies, the Commission should grant indefinite co-primary status for all existing 2GHz microwave systems and permit reasonable system modifications and expansions. NPPD plans for a system modification which could leave a portion of our system licensed on a secondary basis. This could affect the main transmission route on our microwave system.

The District would also like to urge the Commission to adopt rules allowing for the use of voluntary negotiations between licensed users and new service providers. New services in the band should be authorized on a licensed basis only. This would allow existing users to identify interference and to secure reimbursement for relocation.

NPPD supports the petition for rule making filed March 31, 1992, to make the 4GHz, 6GHz and 11GHz common carrier bands available for routine licensing in the private operational microwave service under Part 94, and to adopt appropriate channeling plans and technical standards to ensure that these bands are adequate to meet the needs of existing and future private microwave systems.

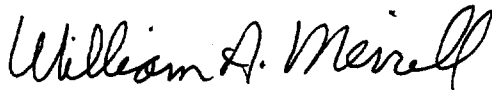
In conclusion, we are strongly opposed to any action by the FCC which would require us to vacate the 1850-2200MHz band because it would be costly and disruptive for Nebraska Public Power District and its customers. We support indefinite co-primary status for existing licensees and new technologies and a market-based approach to negotiations between existing users and new technology licensees.

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Wherefore, the Premises Considered, Nebraska Public Power District respectfully requests the Commission to consider these comments in acting on the subject Notice of Proposed Rule Making.

Respectfully submitted,

NEBRASKA PUBLIC POWER DISTRICT

A handwritten signature in cursive script, reading "William A. Merrill".

William A. Merrill
Vice-President, Operations

/rt

cc: R. W. Watkins
J. H. Quello, FCC
S. P. Marshall, FCC
A. C. Barrett, FCC
E. S. Duggin, FCC